

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
ZACHRY HOLDINGS, INC., <i>et al.</i> ¹)	
)	Case No. 24-90377 (MI)
Debtors.)	
)	(Jointly Administered)

**WHITE & CASE LLP'S SEVENTH MONTHLY FEE STATEMENT FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM DECEMBER 1, 2024 THROUGH DECEMBER 31, 2024**

Name of Applicant:	White & Case LLP	
Applicant's Role in Case:	Attorneys to the Debtors	
Employment Order:	July 10, 2024 [Docket No. 441]	
	Beginning of Period	End of Period
Time period covered by this Statement:	December 1, 2024	December 31, 2024
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:	\$1,594,348.00 (80% of \$1,992,935.00)	
Total reimbursable expenses requested in this Statement	\$729.35	
Total fees and expenses requested in this Statement (exclusive of 20% Holdback):	\$1,595,077.35	
Total fees and expenses requested in this Statement (inclusive of 20% Holdback):	\$1,993,664.35	
Summary of Attorney Fees Requested		
Total attorney fees requested in this Statement:	\$1,969,940.00	
Total actual attorney hours covered by this Statement:	1,561.7	
Average hourly rate for attorneys:	\$1,261	
Summary of Paraprofessional Fees Requested		
Total paraprofessional fees requested in this Statement:	\$22,995.00	
Total actual paraprofessional hours covered by this Statement:	51.1	
Average hourly rate for paraprofessionals:	\$450	

¹ The last four digits of Zachry Holdings, Inc.'s tax identification number are 6814. A complete list of each of the Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtors' proposed claims and noticing agent at www.veritaglobal.net/ZHI. The location of the Debtors' service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 342] (“Compensation Procedures Order”), each Application Recipient receiving notice of the Monthly Fee Statement will have until noon (prevailing Central Time) on the 14th day after the filing of the Monthly Fee Statement, i.e., January 28, 2025, to object to the requested fees and expenses. Upon the expiration of such period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable Monthly Fee Statement that are not objected to.

White & Case LLP (“White & Case”), attorneys for the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) in these chapter 11 cases, files this monthly fee statement (this “Monthly Fee Statement”) for the period from December 1, 2024 through December 31, 2024 (the “Fee Period”) requesting an aggregate amount of \$1,595,077.35 for the Fee Period representing (a) interim allowance and payment of compensation for professional services to the Debtors in the amount of \$1,594,348.00, representing 80% of the \$1,992,935.00 of fees earned by White & Case for professional services to the Debtors during the Fee Period, and (b) reimbursement of 100% of the actual and necessary expenses incurred by White & Case during the Fee Period in connection with such services in the amount of \$729.35.

1. A summary of White & Case’s hours expended and fees earned during the Fee Period by timekeeper (attorneys and paraprofessionals) is attached hereto as **Exhibit A**. A summary of White & Case’s hours expended and fees earned during the Fee Period by category is attached here to as **Exhibit B**. A detailed statement of White & Case’s hours expended and fees earned during the Fee Period is attached hereto as **Exhibit C**. A summary of, and detailed statement of, expenses for which White & Case seeks reimbursement is attached hereto as **Exhibit D**.

2. White & Case attorneys and paraprofessionals expended a total of 1,612.8 hours in connection with the chapter 11 cases during the Fee Period. All services rendered by White &

Case for which compensation is sought pursuant to this Monthly Fee Statement were rendered solely to or on behalf of the Debtors. No payments were received by White & Case from any other source for services rendered or to be rendered in connection with the chapter 11 cases.

3. Pursuant to the Compensation Procedures Order, any party objecting to this Monthly Fee Statement shall serve via email to White & Case and the Notice Parties (as defined in the Compensation Procedures Order) a written notice setting forth the precise nature and basis of the objection and the exact dollar amount at issue (the “Notice of Objection”) before noon (prevailing Central Time) on the 14th day after the filing of this Monthly Fee Statement, i.e., January 28, 2025.

4. Upon expiration of the objection deadline, the Debtors are authorized to pay White & Case an amount equal to 80% of the fees and 100% of the expenses requested in this Monthly Fee Statement that are not subject to an objection. If a Notice of Objection is timely served pursuant to the Compensation Procedures Order, the objecting party and White & Case shall attempt to resolve the objection on a consensual basis. If the parties reach an agreement, the Debtors shall promptly pay White & Case an amount equal to 80% of the agreed-upon fees and 100% of the agreed-upon expenses. If the parties are unable to reach an agreement, then resolution will be governed as set forth in the Compensation Procedures Order.

5. Although White & Case has made every effort to include all fees earned and expenses incurred during the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. White & Case reserves the right to make further statements to this Court for allowance of such fees and expenses not included herein, which further statement will be filed in accordance with the

Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the Compensation Procedures Order.

Dated: January 14, 2025
Houston, Texas

/s/ Charles R. Koster

WHITE & CASE LLP

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*Counsel to the Debtors and
Debtors in Possession*

CERTIFICATE OF SERVICE

I certify that on January 14, 2025, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster

Charles R. Koster